

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	Chapter 11
)	Case No. 25-10068 (CTG)
JOANN INC., <i>et al.</i> , ¹)	(Jointly Administered)
)	
Debtors.)	
)	Obj. Deadline: April 29, 2025 at 4:00 p.m.
_____)	Hearing Date: May 6, 2025 at 1:00 p.m.

**CERTIFICATION OF COUNSEL OF
OOCL USA INC. FOR AN ORDER FOR RELIEF FROM THE
AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d) OR TO COMPEL
ABANDONMENT PURSUANT TO 11 U.S.C. § 554(b)**

The undersigned counsel to OOCL USA Inc., (“OOCL”), hereby certifies as follows:

1. On April 8, 2025, OOCL filed the *Motion of OOCL USA Inc. for and Order for Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) or to Compel Abandonment Pursuant to 11 U.S.C. §554 (b)* [Docket No. 685] (the “Motion”).
2. Objections or responses to the Motion were due on or before 4 p.m. (prevailing Eastern Time) April 29, 2025 (the “Objection Deadline”).
3. Before the Objection Deadline, counsel for the above-captioned debtors contacted the undersigned counsel to resolve the Motion and agreed to the entry of the Order attached hereto as **Exhibit A** Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) Solely to the Extent It Applies (the “Agreed Order”).
4. Except as set forth herein, no other informal or formal response to the Motion has

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

been received. The undersigned further certifies that the Court's docket reflects that no answer, objection, or other responsive pleading to the Motion has been filed.

5. Accordingly, the undersigned counsel to OOCL respectfully requests that the Agreed Order be entered at the earliest convenience of the Court, without further notice or a hearing.

Dated: April 29, 2025

/s/ Daniel C. Kerrick
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